

# Annual Environmental Performance Report

Mereenie Oil and Gas Field Proposed Well Sites WM-25 and WM-26 Environmental Management Plan

**July 2021** 



# **Document Details**

<b>Document Number</b>	9900-630-REP-0003	
Document Title	Annual Environment Performance Report	
EMP's Covered	Mereenie Oil and Gas Field WM-25 and WM-26 Environment Management Plan	
Permit	OL4	
Interest Holder Details	Central Petroleum Mereenie Pty Ltd as trustee for the Central Petroleum Unit Mereenie unit trust, Level 7 / 369 Ann Street, Brisbane QLD 4000 (ABN: 95 009 718 183) Macquarie Mereenie Pty Ltd, Level 6 / 50 Martin Place, Sydney, NSW, 2000 (ABN: 36 616 486 974)	
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Date Approved	5 July 2021	

# **Document Control**

Version	Date	Author	Description
1	5 July 2021	Cam Lambert	2021 submission

# Signature and Certification

We hereby declare that the information provided in this annual environment performance report and accompanying documents is to the best of our knowledge, true and correct.

Signature	Les ruans.
Name	Ross Evans
Position	Chief Operating Officer
Date	5 July 2021



# **Glossary**

Abbreviation / Acronyms	Definition	
AAPA	Aboriginal Areas Protection Authority	
AEPR	Annual Environment Performance Report	
CLC	Central Land Council	
СоР	Code of Practice	
СР	Central Petroleum Limited	
СТР	Central Treatment Plant	
DEPWS	Department of Environment, Parks and Water Security	
DITT	Department of Industry, Trade and Tourism	
EMP	Environmental Management Plan	
EM	East Mereenie	
EPA	Environment Protection Authority	
EPS	Environmental Performance Standard	
ESS	Eastern Satellite Station	
FEMP	Field Environment Management Plan	
GIS	Geographic Information System	
HSE Health, Safety and Environment		
MRN	Mereenie Oil and Gas Field	
NEMP	National Environment Management Plan	
NLC	Northern Land Council	
NORMS	Naturally Occurring Radioactive Materials	
NPI	National Pollution Inventory	
NT	Northern Territory	
OL4 Operating Licence Four		
OL5 Operating Licence Five		
PL2	PL2 Pipeline Licence Two	
ТО	Traditional Owner	
WM	West Mereenie	

Note: throughout the document references to:

- the Department of Environment and Natural Resources (DENR) have been replaced with the Department of Environment, Parks and Water Security (DEPWS)
- The Department of Primary Industries and Resources (DPIR) have been replaced with the Department of Industry, Trade and Tourism (DITT)



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# 1.0 Introduction

This Annual Environment Performance Report (AEPR), as required under the Petroleum (Environment) Regulations 2016 (NT), is presented to demonstrate the environmental performance of Central Petroleum (CP) as the operator of the proposed well sites at WM-25 and WM-26 in respect of achieving the environmental outcomes and performance standards, and monitoring, recording and reporting requirements.

The report includes sufficient information to allow the minister to assess CP's compliance with the obligations described within the MRN Proposed Well Sites WM-25 and WM-26 Environment Management Plan (EMP) approved 06 April 2018 and any other law in force in the Northern Territory related to conduct of the regulated activity.

The AEPR covers the period from 6 April 2020 to 5 April 2021, being the third 12-month period subsequent to the approval date of the EMP. No activity was undertaken under this EMP within the OL4 permit area during the reporting period apart from waste sump sampling and testing.

The WM-26 site was active from April to July 2018 and the proposed WM-25 well was not drilled at the time. Both WM-25 and WM-26 sit within the Mereenie field and since completion of WM-26 both sites have been managed under the Mereenie Field Environmental Management Plan.

# 1.1.1 Background

The regulated activities conducted under the MRN Proposed Well Sites WM-25 and WM-26 EMP relate to the drilling of two new development wells. Site preparations were undertaken for both well pads however upon drilling WM26 and there being no gas flows, the well was cased and suspended. In addition, a decision was subsequently made at the time to not drill WM-25. Therefore, the activities undertaken under this EMP comprised the:

- Well pad development for WM-25 and WM-26
- Temporary camp construction and decommissioning
- Drilling of exploration well WM-26
- Suspension of WM-26

In relation to the above activities it should be noted that rehabilitation of both WM25 and WM25 sites has not yet commenced as CP are still evaluating the technical and commercial viability of drilling WM-25 or re-entering WM-26. Since the completion of the drilling program, waste sump sampling and testing has been undertaken to determine the rehabilitation approach. Both well sites continue to be managed and monitored in alignment with the requirements in the MRN FEMP.

The location of WM-26 and WM-25 within OL4 is shown in Figure 1-1.

# 1.2 Contents of Performance Report

This AEPR describes the environmental performance of CP by evaluating the following:

- 1. Compliance with Ministerial approval conditions
- 2. Compliance with each environmental outcome and performance standard within the approved EMP
- 3. Compliance with reporting requirements in accordance with regulations
- 4. All recordable and reportable incidents, including root cause analysis and related corrective actions to prevent re-occurrence
- 5. Findings of all regulatory inspections and audits and related actions to address any findings

The Code of Practice: Onshore Petroleum Activities in the Northern Territory (legislated 11 June 2019) was released after the approval of the MRN Proposed Well Sites WM-25 and WM-26 and therefore is not applicable to the activities in the EMP.



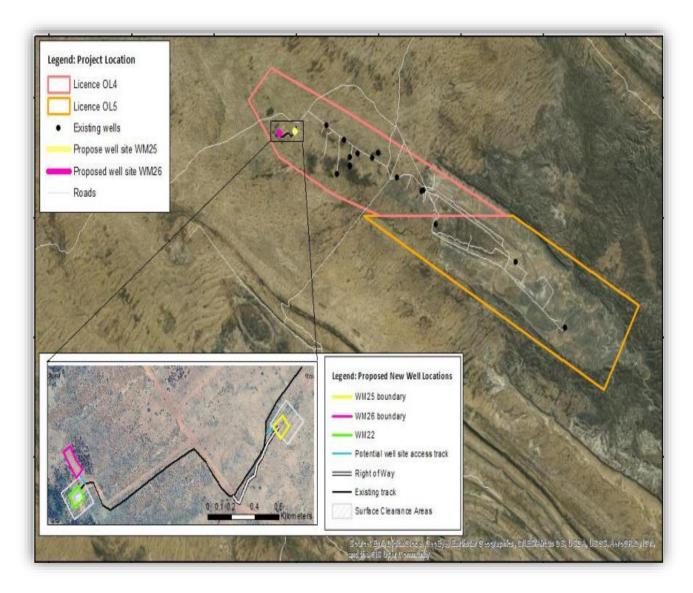


Figure 1-1 Location of proposed WM-25 and WM-26 wells

# 1.3 Assessment of Compliance

Table 1-1 shows the compliance status indicators used in the AERP.

**Table 1-1 Compliance Descriptors** 

Indicator	Description	
Compliant	Compliant Compliant with requirement for entire 12-month reporting period	
Partially Compliant	Compliant with time-bound requirement for the majority of the reporting period	
Not Compliant	Not compliant with the requirement during the reporting period	
Not Applicable	Requirement not applicable during the reporting period	



# 1.4 Evidence of Compliance

The following sources of evidence are used to demonstrate compliance:

- 1. Internal tracking of compliance by CP through:
  - Our incident management system records
  - Quarterly environmental inspections
  - Area and lease inspection reports
  - Work management and maintenance system records
  - Daily production reports
  - Various registers in place including:
    - animal control, waste, hazardous goods, chemical, weed control
  - Our stakeholder engagement records
- 2. Reports provided under the National Greenhouse and Energy Reporting Act
- 3. Outcome from regulatory inspections conducted by the Department of Environment, Parks and Water Security (DEPWS), Petroleum Operations
- 4. Recordable and reportable incident reports submitted to DEPWS Petroleum Operations
- 5. Reports provided to DEPWS, the Department of Industry, Trade and Tourism (DITT) and other government agencies.



# 2.0 Demonstration of Compliance

# 2.1 Ministerial Approval Conditions

The MRN Proposed Well Sites WM-25 and WM-26 EMP was approved by the Minister for Primary Industry and Resources on 06 April 2018 with conditions, which are assessed for compliance in Table 2-1.

**Table 2-1 Compliance with Ministerial EMP Approval Conditions** 

No	Ministerial Condition	Compliance Status	Evidence
1	1(a)(I) drilling sumps are to be appropriately lined to ensure appropriate containment. Appropriate methods including lining sumps with a HDPE liner or compacted material, which is tested to 10 <sup>-9</sup> infiltration rate with testing to be submitted to the DITT	Compliant	The drilling sump was lined as per the condition. The specification for the liner was captured in our procurement system and installation was completed as part of the lease build by an independent contractor. Daily project reports from 23 and 24 April 2018 referenced the installation of the liner and photographic evidence of the lined sump was included in those reports.
2	1(a)(II) Engineering designs are to be submitted for DITT review prior to all construction / upgrades that are to occur	Compliant	Engineering designs for all construction / upgrades were submitted to DITT Petroleum Operations via email on 20 April 2018 for review prior to construction activity commencing.
3	1(a)(III) All chemical disclosure requests made by the DITT will be responded to within 48 hours	Not Applicable	Prior to and during the regulated activities, no requests from DITT were received therefore this condition was not triggered.

# 2.2 Environmental Outcomes and Environmental Performance Standards

Table 2-2 provides a systematic overview of CP's compliance with the environmental outcomes and environmental performance standards within the approved MRN Proposed Well Sites WM-25 and WM-26 EMP. The environmental outcomes for the MRN Proposed Well Sites WM-25 and WM-26 EMP (as listed in Table 2-2 below) are sourced from the 'environmental objectives' in Table 8-1 of the MRN Field Environmental Management Plan 2017 (FEMP) and the environmental performance standards sourced from 'environmental outcomes' in Table 8-1 of the MRN FEMP and the 'mitigation measures / performance standards' in Tables 8-2 to 8-13 of the MRN FEMP.

 Table 2-2 Compliance with Environmental Outcomes and Environmental Performance Standards

No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
1	Prevent a loss of biodiversity	No off-road driving	•	Incident management system did not identify any instances of unauthorised off-road driving.



No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
	through injury to fauna, unauthorised	No driving above designated speed limits	Compliant	Incident management system did not identify any instances of vehicles speeding.
	disturbance to native flora, fauna and fauna	No unauthorised night-time driving	Compliant	Incident management system did not identify any instances of unauthorised night-time driving. Also, journey management system records didn't identify any approved night-time driving.
	habitat, the spread of weeds,	No driving under the influence of alcohol, BAC=0	Compliant	Incident management system did not identify any instances of employees or contractors driving under the influence of alcohol.
	increases in predator species, introduced fauna because of the	Fauna fatalities register completed for each incident, near miss and appropriate action taken to reduce potential for further incidents	Compliant	The animal control register was used to record any instances of sightings, near misses or strikes as required across sight.
	activities conducted in the OL area.	No fauna access to waste	Compliant	Incident management system did not identify any instances of fauna access to waste. Regular area inspections did not identify any instances where bins were not secured to prevent fauna access.
		No weeds will be present in areas where fill has been used	Not Applicable	Not fill was brought onto the lease at WM25 or WM26, therefore the EPS was not triggered.
		No new infestation of weeds	Complaint	The annual weed survey undertaken in July 2020 did not identify any new NT declared weeds or Weeds of National Significance. Weed management activities continued during the period.
		No spills or leak of hazardous material into surrounding environment	Compliant	Incident management system did not identify any instances of spills or leak of hazardous material into surrounding environment.
		No unauthorised land clearing	Not Applicable	No clearing was required or undertaken at WM25 or WM26, therefore the EPS was not triggered.
		No unauthorised third-party access	Compliant	Incident management system records did not identify any instances of unauthorised access to site.
		All spills or leaks of hazardous material will be remediated in accordance with the NEMP guidelines	Not Applicable	Incident management system did not identify any instances of spills or leak of hazardous material which needed to be remediated.
		All vehicles will be serviced according to vehicle manufacturer specifications and frequency requirements and the NT Motor Vehicle registry standards	Compliant	All CP controlled vehicles have preventative maintenance schedules in line with OEM guidelines and NT standards. Work orders were raised and closed out in the maintenance system to demonstrate compliance



No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
		No feeding of local fauna	Compliant	Incident management system records did not identify any instances of employees or contractors feeding local fauna.
		Areas no longer required for safe operation will commence rehabilitation within 12 months of decommissioning	Not Applicable	No rehabilitation has commenced as CP are still evaluating the technical and commercial viability of drilling WM-25 or re-entering WM-26. As such, both sites are still classified as operating areas and are being managed and monitored under the MRN FEMP, therefore the EPS was not triggered.
2	Prevent land degradation as a	No unauthorised clearing	Not Applicable	No clearing was required or undertaken at WM25 or WM26, therefore the EPS was not triggered.
	result erosion (water / wind) and sedimentation issues, new road / clearing /	Location of topsoil mounds will be clearly marked and less than 1.5m high	Not Applicable	During the civils phase of the project the topsoil was identified as sand only in the areas where the pads were developed and was not suitable for reuse. The upper sands to promote vegetation regrowth were pushed to the side of the lease and not stockpiled, therefore none was stored, and the EPS was not triggered.
	construction and maintenance	No off-road driving	Compliant	Incident management system did not identify any instances of unauthorised off-road driving.
	activities as well as topsoil management	No unauthorised third-party access	Compliant	Incident management system records did not identify any instances of unauthorised access to site.
	activities conducted in the OL area	Areas no longer required for safe operation will commence rehabilitation within 12 months of decommissioning	Not Applicable	No rehabilitation has commenced as CP are still evaluating the technical and commercial viability of drilling WM-25 or re-entering WM-26. As such, both sites are still classified as operating areas and are being managed under the MRN FEMP, therefore the EPS was not triggered.
		All erosion and sedimentation control devices will be designed and constructed following DEPWS and IECA guidelines and best practice principles	Compliant	Area inspections records confirmed that erosion and sedimentation control devices were in place and compliant with DEPWS and IECA best practice guidelines. Incident management system records did identify some instances of erosion which were remediated and closed out in our maintenance system.
		No windrows or concentration points	Compliant	Area inspections and incident management system records did not identify any significant windrows or concentration points. Activities to prevent / manage land degradation were continuous undertaken during the reporting period.



No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
		Disturbed areas will be restored to a landform consistent with surrounding environment with no blocking of drainage channels or water courses	Not Applicable	No rehabilitation has commenced as CP are still evaluating the technical and commercial viability of drilling WM-25 or re-entering WM-26. As such, both sites are still classified as operating areas and are being managed under the MRN FEMP, therefore the EPS was not triggered.
		No new erosion or sedimentation will occur on rehabilitated surfaces first significant rainfall	Not Applicable	No rehabilitation has commenced as CP are still evaluating the technical and commercial viability of drilling WM-25 or re-entering WM-26. As such, both sites are still classified as operating areas and are being managed under the MRN FEMP, therefore the EPS was not triggered.
		Annual rehabilitation report to be submitted to DITT / DEPWS including:  - total area rehabilitated  - photo monitoring points, GPS locations and results  - any areas left in agreement with future landholders/managers  - monitoring of progressive rehabilitation, including flora type and density, fauna activity, and soil stability  - any erosion and sedimentation issues  - any stakeholder consultations and results of discussions  - any issues noticed and remedial actions taken  - monitoring of contaminated sites	Not Applicable	No rehabilitation has commenced as CP are still evaluating the technical and commercial viability of drilling WM-25 or re-entering WM-26. As such, both sites are still classified as operating areas and are being managed under the MRN FEMP, therefore the EPS was not triggered. However, waste sump material was sampled and tested during the reporting period. These results will inform the approach to rehabilitation of the material within the facility. The initial results have been shared with DEPWS.
		All staff will be inducted to the FEMP / EMP	Compliant	MRN site induction records identified that all employees and contractors were inducted prior to or upon arrival at site and before any work commenced. Incident management system records did not identify any employees and contractors who were not inducted. Induction materials include environmental content which deals with erosion and sedimentation risks and controls.
3	To prevent surface and groundwater	Clearing works or disturbance will not affect the long-term stability of existing drainage channels or water courses	Not Applicable	No clearing was undertaken during the period, therefore the EPS was not triggered.



No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
	degradation, contamination or alteration to natural drainage	Regular testing of groundwater quality, extraction volumes and static water level recorded.	Compliant	Groundwater extraction records were recorded, and regular testing of groundwater was undertaken. A static water level was recorded during the period. A comprehensive groundwater monitoring plan for the Mereenie field was approved by DEPWS in January 2021.
	patterns and flow lines, downstream	No uncontrolled or unregulated release of wastes	Compliant	Incident management system did not identify any instances of uncontrolled or unregulated release of wastes.
	water courses as a result of activities	No waste or hazardous material stored with potential for impact on water courses	Not Applicable	No waste or hazardous material stored in the area during this reporting period, therefore the EPS was not triggered.
	conducted in the OL area	No unregulated disposal of greywater	Compliant	Incident management system did not identify any instances of unregulated disposal of greywater
		All staff inducted will be inducted to the FEMP/EMP	Compliant	MRN site induction records identified that all employees and contractors were inducted prior to or upon arrival at site and before any work commenced. Incident management system records did not identify any employees and contractors who were not inducted. Induction materials include environmental content which deals with surface and ground water.
4	Ensure all waste streams	No uncontrolled or unregulated release of wastes	Compliant	Incident management system did not identify any instances of uncontrolled or unregulated release of wastes.
	generated in the OL area are dealt with and	No fauna access to waste	Compliant	Incident management system did not identify any instances of fauna access to waste.
	contained; to have minimal	All waste will be separated and stored appropriately.	Not Applicable	No waste related the area was generated during this reporting period, therefore the EPS was not triggered.
	impact on the environment	All waste not requiring routine removal will be stored in a waste management area for re-use or ultimate offsite disposal	Not Applicable	No waste related the area was generated during this reporting period, therefore the EPS was not triggered.
		Waste will be removed by an appropriately licensed and NT EPA approved contractor where required	Not Applicable	No waste related the area was generated during this reporting period, therefore the EPS was not triggered.
		All waste (quantity and type of waste) removed from site will be recorded	Not Applicable	No waste related the area was generated, therefore the EPS was not triggered.



No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
		Only approved waste will be burnt in a designated burn pit	Not Applicable	No waste related the area was generated, therefore the EPS was not triggered.
		Predator species and introduced fauna activity will be monitored around waste storage areas	Compliant	Incident management system did not identify any instances of fauna access to waste. Fauna are regularly seen on the lease and are monitored.
		No increase in invasive flora, NT declared weeds or WoNS in waste disposal areas	Complaint	Weeds survey undertaken in July 2020 at MRN did identify some weeds in waste disposal areas, however these were minor and were controlled as part of regular activities.
		All listed waste will be disposed of in accordance with the NT EPA listed waste register	Not Applicable	No waste related the area was generated, therefore the EPS was not triggered.
		All hazardous waste material will be separated in the appropriate area for disposal according to their SDS, and the hazardous goods register	Not Applicable	No waste related the area was generated, therefore the EPS was not triggered.
		All waste will be stored in appropriately bunded areas	Not Applicable	No waste related the area was generated, therefore the EPS was not triggered.
		Waste will be managed according to the waste reduction hierarchy	Compliant	Discussion with site management and procurement indicated that efforts are continuously being made to reduce material imported to site and measures to re-use where possible or separation for recycling.
		No waste found outside of designated areas	Compliant	Area inspection and incident management system records did not identify any waste being stored outside of designated areas.
		No accumulation of waste in vehicles	Compliant	Vehicle pre-start checklist prompt drivers to check to ensure vehicles are clean. A review of checklists conducted did not indicate any accumulated waste in vehicles.
		No contamination to soil from liquid waste containers	Compliant	Area inspection and incident management system records did not identify any instances of liquid waste containers leaking and contaminating soil.
		Clean-up / spill kits will be provided in all relevant areas	Compliant	Area inspections records confirmed that clean up and spill kits were located in appropriate areas across site. Incident management records did not identify any spill kits which were incomplete or missing.



No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
		All clean up material will be appropriately disposed of for ultimate off-site disposal	Not Applicable	There were no clean up necessary during this reporting period, therefore the EPS was not triggered.
		All spills and/or leaks are remediated as soon as possible	Not Applicable	There were no spills and leaks during this reporting period, therefore the EPS was not triggered.
		All spills and leaks are reported to the regulator as required	Not Applicable	There were no spills and leaks during this reporting period, therefore the EPS was not triggered.
		No unregulated disposal of wastes	Compliant	Incident management system did not identify any instances of unregulated release of wastes.
		All staff, visitors and contractors will be inducted to the MRN FEMP	Compliant	MRN site induction records identified that all employees and contractors were inducted prior to or upon arrival at site and before any work commenced. Incident management system records did not identify any employees and contractors who were not inducted. Induction materials included waste management content.
5	Minimise the adverse effects on air quality and noise to surrounding receptors from the operation in the OL area	No uncontrolled release of gas	Compliant	Incident management system did not identify any instances of uncontrolled release of gas.
		No unauthorised flaring of gas	Compliant	Incident management system did not identify any instances of unauthorised flaring of gas.
		No open flames or fires outside of designated areas	Compliant	Incident management system / routine inspection records did not identify any specific instances of open flames outside of designated areas.
		Smoking restricted to designated areas	Compliant	Incident management system records did not identify any instances of smoking outside of designated areas.
		Emissions of greenhouse gases and fugitive emissions will be minimised	Complaint	Emissions of greenhouse gases and fugitive emissions are captured and reported in under the National Greenhouse and Energy Reporting Act. Efforts are made on site to minimise emissions where practical such as limiting vehicle journeys.
		Noise complaints will be minimised	Compliant	Incident management system records did not identify any instances of noise complaints. There are no neighbours close to site, but CP as detailed in their stakeholder engagement records proactively engagement with stakeholders and interested parties.



No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
		Consult with and record engagement with stakeholders any potential impacts to air and noise quality.	Not Applicable	No increased noise or air quality issues as a result of activities was recorded therefore the EPS was not triggered.
		All vehicles will be serviced to vehicle manufacture specifications and frequency and registered in accordance with NT motor vehicle registry regulations and workplace health and safety regulations	Compliant	The maintenance management system captured all CP controlled vehicles and their maintenance records e.g. preventative maintenance schedules and executed activities. No overdue maintenance activities were identified. All vehicles used at MRN had the appropriate registration either pastural or road.
		No decrease in air quality due to fires	Not Applicable	Incident management system records did not identify any fires on site therefore the EPS was not triggered.
		Only approved waste will be burnt in a designated burn pit	Not Applicable	No waste related the area was generated, therefore the EPS was not triggered.
		All staff will be inducted to the MRN FEMP	Compliant	MRN site induction records identified that all employees and contractors were inducted prior to or upon arrival at site and before any work commenced. Incident management system records did not identify any employees and contractors who were not inducted. Induction materials include air quality and noise content.
6	Minimise the adverse effect on people (injury or	No open flames or fires outside of designated areas	Compliant	Incident management system / routine inspection records did not identify any instances of open flames or fires outside of designated areas.
	death), infrastructure and	No smoking outside of designated areas	Compliant	Incident management system records did not identify any instances of smoking outside of designated areas.
	the surrounding receptors from fire, either caused by operations in the OL area or	Firefighting equipment will be available and serviced as per manufacturer specifications	Not Applicable	There were no operations during this reporting period hence no firefighting equipment necessary, therefore the EPS was not triggered.
		SDS will be available and appropriate firefighting equipment next to all flammable material stores.	Not Applicable	There was no flammable material stored during this reporting period, therefore the EPS was not triggered.
	natural causes	Staff will be trained in the use of firefighting equipment	Compliant	Training records confirmed that all field-based personnel have received fire extinguisher training.
		Existing and new fire breaks will be maintained to keep at least 4m clear around all infrastructure or at low vegetation cover (<10cm)	Compliant	Area inspections records confirmed that fire breaks were maintained to keep at least 4m clear around all infrastructure. If any remediation was identified work orders were raised and completed.



No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
		No petrol vehicles on site	Compliant	Incident management system records did not identify any instances where petrol vehicles were on site.
		No combustible material will be stored or transported within 25m of the flare pit	Compliant	Area inspections / incident management system records did not identify any instances of combustible material being stored or transported within 25m of the flare pit.
		Volumes of gas flares will be minimised where possible	Not Applicable	No flaring was undertaken during this reporting period, therefore the EPS was not triggered.
		Gas will undergo complete combustion when flared	Not Applicable	No flaring was undertaken during this reporting period, therefore the EPS was not triggered.
7	Ensure all heritage and culturally	No unauthorised third-party access	Compliant	Incident management system records did not identify any instances of unauthorised access to site.
	significant sites (registered or	No unauthorised clearing	Not Applicable	No clearing was required or undertaken during the reporting period, therefore the EPS was not triggered.
	unregistered) are identified and protected within	No illicit drugs and alcohol on site	Compliant	A review of incident management system and records of routine testing did not identify any incidents or positive tests.
	the OL area	No unauthorised firearms on site	Compliant	Incident management records did not identify any unauthorised firearms on site and the results of regular audits during the reporting period confirmed that the firearms on site are being managed in accordance with standards.
		No impact to cultural heritage sites	Compliant	Incident management records did not identify any incidents which impacted cultural heritage sites.
		Traditional owners will be allowed to access the site at any time	Compliant	Site access records did not identify any specific non-employee TO visits to site, however TO visits are allowed.
		All staff will be inducted to the MRN FEMP.	Compliant	MRN site induction records identified that all employees and contractors were inducted prior to or upon arrival at site and before any work commenced. Incident management system records did not identify any employees and contractors who were not inducted. Induction materials include content which deals with heritage and culturally significant sites.



# 2.3 Mandatory Reporting Requirements

Table 2-3 demonstrates CP's compliance with the reporting requirements under the Petroleum (Environment) Regulations 2016 (NT) Schedule 1, item 11(2), which requires all information required to be recorded, monitored or reported. Where relevant, CP also confirms that all records, monitoring or required reporting under the Petroleum (Environment) Regulations 2016 (NT) has been provided to DEPWS or the relevant NTG agency except for the elements highlighted in Table 2-3.

**Table 2-3 Compliance with Mandatory Reporting Requirements** 

No	Reference	Requirement	Compliance Status	Evidence
1	Reg 14	A current EMP remains in force until the interest holder notifies the Minister the activity is no longer being carried out and all of the environmental outcomes and obligations under the plan have been met, and the Minister advises the interest holder the notice is accepted and the plan ceases to be in force.	Not Applicable	CP are still evaluating the technical and commercial viability of drilling WM-25 or re-entering WM-26. As such, both sites are still classified as operating areas and are being managed and monitored under the MRN FEMP.
2	EMP s 13 Stakeholder Consultation Schedule 1, Item 9(2)	Interest holders are required to conduct future engagement with stakeholders, in accordance with the description in the EMP.	Compliant	MRN stakeholder communications log records indicated CP's continued engagement with identified stakeholders after the project as part of the MRN field engagement plan.
3	EMP s 11 Reporting Reg 33	DEPWS is notified of reportable incidents within 2 hours of the interest holder becoming aware of the incident, or within 2 hours of the incident occurring. A written report must be provided within 24 hours if the initial report was made orally.	Not Applicable	CP did not have any reportable incidents as a result of the activities outlined in the EMP.
4	EMP s 11 Reporting Reg 34	Reports on reportable incidents are to be provided to DEPWS as soon as practicable and within 72 hours of the event occurring. A final report must be provided to DEPWS within 30 days after remediation/clean-up of the affected area.	Not Applicable	CP did not have any reportable incidents as a result of the activities outlined in the EMP.



No	Reference	Requirement	Compliance Status	Evidence
5	EMP s 11 Reporting Reg 35	A written report of all recordable incidents must be provided to DEPWS not later than 15 days after the 90-day reporting period (unless otherwise agreed).	Compliant	There were no operations during the current reporting period, therefore the requirement to submit recordable incident reports each 90 days did not apply. However, based on guidance from DEPWS reports are now being submitted in line with the new quarterly reporting timetable.
6	Reg 37A	A report about flowback fluid from hydraulic fracturing must be provided to the Minister within 6 months of the flowback occurring.	Not Applicable	The regulated activity did not include hydraulic fracturing
7	Reg 37B	A report about produced water from hydraulic fracturing must be provided to the Minister within 6 months of the produced water being extracted.	Not Applicable	The regulated activity did not include hydraulic fracturing
8	Schedule 1, item 12	Interest holder must notify the Minister, occupier and owner of the land on which the activity is to be carried out before commencement of construction, drilling, or seismic surveys	Compliant	The Minister was informed indirectly via correspondence with DITT in various correspondence in late April 2018 prior regulated activity commencing under this EMP. In addition, the CLC representing the traditional owners were informed via email in April 2018.
9	EMP s 11.4 Emissions and Discharge Reporting National Greenhouse and Energy Reporting Act 2007 s 19	A registered corporation must provide a report to the Greenhouse and Energy Data Officer relating to the greenhouse gas emissions, energy production and energy consumption from the operation of facilities under the operational control of the corporation and entities that are members of the corporation's group, during that financial year	Compliant	Reporting greenhouse gas emissions at MRN including was undertaken as per the National Greenhouse and Energy Reporting Act and was submitted in September 2020.
10	EMP s 11.2 Routine Reporting Schedule 1, item 11(2)	Environmental compliance report to be submitted to DITT / DEPWS annually as part of the MRN FEMP submission	Compliant	The annual environmental performance was undertaken and reported in September 2020 of the regulated activities and assessed against the environmental objectives and performance standards in the EMP.



No	Reference	Requirement	Compliance Status	Evidence
11	Environment Protection and Biodiversity Conservation Act 1999 (Cth) s 199, s 214, s 256	If a person who undertakes an activity that results in the unintentional death, injury, trading, taking, keeping or moving of a member of a listed threatened species (except a conservation dependent species), a member of a listed threatened ecological community, all cetacean (whale, dolphin or porpoise) species, a member of a listed migratory species, or a member of a listed marine species in or on a Commonwealth area and the activity was not authorised by a permit, then Secretary of the Department must be notified within 7 days of the person becoming aware of the results of the activity.	Not Applicable	No notification necessary as CP did not have any instances of the activity described.
12	National Environment Protection (National Pollution Inventory) Measure 1998 (Cth) s 9 Waste Management and Pollution Control Act 2003 (NT)	The occupier of each reporting facility is to be required to provide information to the NPI if a reporting threshold for a substance is exceeded	Not Applicable	No notification necessary as CP did not have any instances of the threshold exceedance during the reporting period.
13	Bushfires Management Act 2016 (NT) s 90	If the owner or occupier of the land is unable to control a fire on the land, the owner or occupier must take all reasonable steps to notify a fire control officer or fire warden, and the occupier of any land to which the fire is likely to spread or a person apparently over the age of 16 years present on that land	Not Applicable	No notification necessary as CP did not have any uncontrolled fires on site.



No	Reference	Requirement	Compliance Status	Evidence
14	Environment Protection Act 2019 (NT) div 8	Duty to notify the NT EPA as soon as practicable but within 24 hours of any incident which occurs which causes or threatens to cause material or significant environmental harm	Not Applicable	No notification necessary as CP did not have any incidents which caused or threatened to cause material or significant environmental harm as a result of the activities outlined in the EMP.
15	Territory Parks and Wildlife Conservation Act 1976 (NT) s 49	The Director may, by notice in writing require the owner or occupier of land in a feral animal control area to undertake the measures specified in the notice for the control or eradication of feral animals on the land	Not Applicable	No notice provided by the Director.
16	Waste Management and Pollution Control Act 1998 (NT) s 14	Duty to notify the NT EPA as soon as practicable but within 24 hours of any incident which occurs which causes or threatens to cause pollution resulting in material or significant environmental harm	Not Applicable	No notification necessary as CP did not have any incidents which caused or threatened to cause pollution resulting in material or significant environmental harm as a result of the activities outlined in the EMP.
17	Weeds Management Act 2001 (NT) s 29	When given notice by the Minister, land occupiers and landowners have a duty to notify the Minister of the presence of a plant, declared weed or potential weed on the land within the time specified in the notice	Not Applicable	No notice provided by the Minister.



# 3.0 Summary of Compliance

# 3.1 Overview of Compliance

Table 3-1 provides a summary of the results of the compliance assessment against the 102 total compliance items.

**Table 3-1 Compliance Summary** 

Compliance Indicator	Number	Percentage	
Compliant	58	57%	
Partially Compliant	0	0%	
Non-Compliant	0	0%	
Not Applicable	44	43%	

# 3.2 Overview of Items Found Not Compliant or Partially Compliant

The following sections describe:

- The specific compliance requirements not met for the reporting period
- An analysis of the possible potential environmental harm or impact to environmental values resulting from non-compliance or partially compliance, using multiple lines of evidence
- A summary of the corrective actions already implemented, and further actions still required, as applicable, to ensure compliance is fully achieved in the future.

### 3.2.1 Environmental Performance Standards

There were no environmental performance standards found to be non-compliant or partially compliant.

# 3.2.2 Regulatory Reporting

There were no reporting requirements found to be non-compliant or partially compliant.

# 3.3 Application of Lessons Learned Across Central Petroleum Onshore Interests

The key lessons learned and how these have been applied are as follows:

- Continued proactive communication with regulators to clarify expectations;
- Given the language in the EMP not aligning with current regulations, Central have had to adopt alternative text and measures for the development of 'management objectives' and 'performance standards'. This has resulted in some duplication as well as the adoption of some absolute statements rather than a focus on the environmental outcomes. Therefore, there is an opportunity to consider modifying the current wording of the in the EMPs to better reflect the impact / effect on the environment.